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BEVERLY L. BOVE  
VINCENT J. X. HEDRICK, II

March 24, 2008

**VIA EFILE & HAND DELIVERY**

The Honorable Sue L. Robinson  
U.S. District Court for the District of Delaware  
844 North King Street  
Lock Box 31  
Wilmington, DE 19801

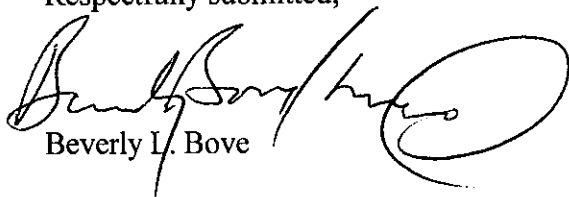
**RE: Susan Shoemaker v. Chelcie & Stacey McConnell  
Civ. No.: 08-014-SLR**

Dear Chief Judge Robinson:

Enclosed for the Court's consideration is Plaintiff's Proposed Scheduling Order. The Scheduling Conference is currently scheduled for Wednesday, March 26, 2008 at 8:30a.m. We previously sent the draft Scheduling Order to Mr. Casarino, but we have not yet heard from him. I do understand that Mr. Casarino has been out of town.

If the Court has any questions, I remain available to answer them. I appreciate Your Honor's consideration of this matter.

Respectfully submitted,



Beverly L. Bove

BLB/kmw  
Enclosure

Cc: Stephen P. Casarino, Esquire

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

Susan Shoemaker,	:	Civ. No.: 08-014-SLR
Plaintiff,	:	
	:	
	:	Civil Action
v.	:	
	:	
Chelcie McConnell and Stacey McConnell,	:	
Defendants.	:	

**SCHEDULING ORDER**

At Wilmington this 26<sup>th</sup> day of March, 2008, the parties having satisfied their obligations under Fed. R. Civ. P. 26(f), and the court having conducted a pretrial scheduling conference pursuant to Fed. R. Civ. P. 16 and D. Del. LR 16.2(a) and (b).

IT IS ORDERED that:

1. Pre-Discovery Disclosures. The parties will exchange by April 28, 2008 the information required by Fed. R. Civ. P. 26(a)(1) and D. Del. LR 16.2.

2. Discovery.

(a) Discovery will be needed on the following subjects: liability, depositions, written discovery from parties, and medical discovery.

(b) All discovery shall be commenced in time to be completed by December 26, 2008.

(c) Maximum of 50 interrogatories by each party to any other party.

(d) Maximum of 50 requests for admission by each party to any other party.

(e) Maximum of 5 depositions by plaintiff and 5 by defendants.

(f) Each deposition limited to a maximum of 2 hours unless extended by agreement of parties.

(g) Reports from retained experts under Rule 26(a)(2) on issues for which any party has the burden of proof due by June 26, 2008. Rebuttal expert reports due by August 26, 2008.

(h) Discovery Disputes. Any discovery dispute shall be submitted to the court pursuant to Fed. R. Civ. P. 37. During the course of discovery, each party is limited to two (2) Rule 37 motions. The court shall make itself available, however, to resolve through a telephone conference, disputes that arise during the course of a deposition and disputes related to entry of a protective order.

3. Joinder of other Parties, Amendment of Pleadings, and Class Certification. All motions to join other parties, amend the pleadings, and certify a class action shall be filed on or before June 26, 2008.

4. Settlement Conference. Pursuant to 28 U.S.C. § 636, this matter is referred to a Magistrate Judge for the purposes of exploring ADR.

5. Summary Judgment Motions. All summary judgment motions shall be served and filed with an opening brief on or before January 26, 2009. Briefing shall be pursuant to D. Del. LR 7.1.2. No summary judgment motion may be filed more than ten (10) days from the above date without leave of the court.

6. Applications by Motion. Any application to the court shall be by written motion filed with the clerk. Unless otherwise requested by the court, counsel shall not deliver copies of papers or correspondence to chambers. Any non-dispositive motion shall contain the statement required by D. Del LR 7.1.1.

7. Motions in Limine. All motions in limine shall be filed on or before (two weeks before pretrial conference). All responses to said motions shall be filed on or before (one week before pretrial conference).

8. Pretrial Conference. A pretrial conference will be held on \_\_\_\_\_ at \_\_\_\_\_ in courtroom \_\_\_\_\_, Wilmington, Delaware. The Federal Rules of Civil Procedure and D. Del. LR 16.4 shall govern the pretrial conference.

9. Trial. This matter is scheduled for a \_\_\_\_\_ trial commencing on \_\_\_\_\_ in courtroom \_\_\_\_\_, Wilmington, Delaware. For purposes of completing pretrial preparations, the parties should plan on being allocated a total number of hours in which to present their respective cases.

\_\_\_\_\_  
United States District Judge